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June 22, 2023

VIA ECF

Hon. Ann M. Donnelly, U.S. District Court
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Gilead Sciences, Inc., et al. v. Safe Chain Solutions, LLC, et al.
Case No. 21-cv-4106 (AMD) (RER)

Dear Judge Donnelly:

This firm represents Defendants Raoul Diamantstein and Lieb Pharmacy, Inc. (collectively, "Lieb"). We write to respectfully request that the Court adjourn and reschedule the upcoming Pre-Motion Conference regarding the Lieb's Motion to Dismiss, now scheduled for Wednesday, June 28, 2023 [Doc. 1096].

Good cause exists for this request since the undersigned counsel for Lieb will be in South Carolina and is unable to attend the Court appearance in person on the day the Pre-Motion Conference is presently scheduled. Lieb's counsel did request that Plaintiffs' counsel consent to a virtual Pre-Motion Conference on the now-scheduled date. However, Plaintiffs' counsel was not amenable to that request.

Accordingly, after consulting with Plaintiffs' counsel, the parties respectfully request that the Pre-Motion Conference be scheduled between July 18, 2023 and July 21, 2023 on a day that is preferable to the Court's schedule. Alternatively, Lieb's counsel is amenable to attending telephonically or by Zoom. We thank Your Honor for her consideration of this request.

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI, LLP

/s/Peter G. Siachos

PETER G. SIACHOS

cc: All Counsel of Record (via ECF)